

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

**UNITED STATES OF AMERICA** )

**Plaintiff,** )

**vs.** )

**CASE NUMBER: 21-MJ-8156-GCS**

**GODFREY HUBBARD** )

**aka CHARLIE HUBBARD** )

**Defendant.** )

**CRIMINAL COMPLAINT**

I, Treva E. Mathews, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**Count 1**  
**Attempted Enticement of a Minor**

From on or about June 24, 2021, until on or about June 25, 2021, the defendant,

**GODFREY HUBBARD,**

in Madison County, Illinois, within the Southern District of Illinois, and elsewhere, using facilities of interstate commerce, that is a cellphone connected to the Internet, did knowingly attempt to persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, to engage in prostitution and in sexual activity under such circumstances as would constitute a criminal act under 720 ILCS 5/11-1.60(d) (Aggravated Criminal Sexual Abuse), in violation of 18 United States Code, Section 2422(b).

I further state that this complaint is based on the following facts:

**INTRODUCTION**

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since 2020. I graduated in December of 2017 from Tiffin University in Tiffin, Ohio, with a master's degree in Criminal Justice. I have six years of experience as a trained law enforcement officer. I am a graduate of the FBI Academy, where I received training in a variety of investigative and legal matters, including topics of Fourth Amendment searches, drafting search warrant Affidavits, and Probable Cause. I am presently assigned to the Springfield Division's Violent Crimes Against Children Squad, which focuses on investigating individuals and dismantling organizations responsible for the sexual exploration of children through the manufacture and distribution of child pornography. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

2. I have investigated and assisted in the investigation of criminal matters involving the sexual exploitation of children that constituted violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423. In connection with such investigations, I have served as the case agent, have been the affiant for several search warrants, and have conducted interviews of defendants and witnesses. As a federal agent, I am authorized to investigate and assist in the prosecution of violations of laws of the United States and to execute search warrants and arrest warrants issued by federal and state courts.

3. The statements contained in this affidavit are based on my personal knowledge as well as on information provided to me by other law enforcement officers. This affidavit is being submitted for the limited purpose of securing a criminal complaint and an arrest warrant, and I have not included each and every fact known to me concerning this investigation.

4. I have set forth only the facts that I believe are necessary to establish probable cause to believe that **GODFREY HUBBARD** committed violations of Title 18, United States Code, Sections 2422(b).

**BACKGROUND OF INVESTIGATION AND  
FACTS ESTABLISHING PROBABLE CAUSE**

5. On approximately June 25 and 26, 2021, agents from the Federal Bureau of Investigation Undercover Employee (“UCE”) with a joint taskforce of various state and federal law enforcement agencies conducted an undercover investigation targeting subjects who were attempting to engage in sexual activity with minors.

6. Starting on approximately June 22, 2021 through June 26, 2021, undercover agents began posting ads on various online social media and dating platforms and application. The ads were primarily dating profiles photos of a young-looking male and female adult confidential sources.

7. A residence in Collinsville, Illinois was obtained to be the location that targets were directed to for engaging in sexual activity with the fictitious minors from the online profiles.

8. On approximately June 25, 2021, an FBI UCE created a profile on an online social media and dating application.

9. An individual, who was later identified as **GODFREY HUBBARD** (hereinafter referred to as “**HUBBARD**”), using profile name “Mknwavz” initiated a conversation with UCE, whose profile displayed the name “Boi sucker”.

10. The UCE then requested they moved the conversation to text message. UCE texted **HUBBARD** at phone number 618-409-0876, which **HUBBARD** provided to the UCE

Portions of the conversation are as follows:

**UCE:** Are u u,cool with me being younger

....

**HUBBARD:** I prefer younger

**UCE:** I'm 14 but I'll be 15 end of July

...

**HUBBARD:** That's different.

...

**HUBBARD:** I thought you were 18.

**HUBBARD:** I'll still talk to you, I'll be your friend. I'll even still take you out to lunch. I'll have to seriously think about anything further.

...

**HUBBARD:** Do me a favor. Take a picture of yourself holding a piece of paper with my name on it.

...

**HUBBARD:** This make me nervous.

...

**HUBBARD:** I just want to make sure you're real. I'm not going to jail.

...

**HUBBARD:** So how do I meet you without neighbors asking questions?

...

**HUBBARD:** What do you like, or do you even know?

...

**HUBBARD:** Then we'll go till you say stop.

...

**UCE:** Do you have a condom

**HUBBARD:** Yes

11. During the conversation, discussions about planning a meet up occurred and the UCE directed **HUBBARD** to the undercover residence. **HUBBARD** agreed to meet at the undercover house in Collinsville, Illinois.

12. In total, the conversations took place between June 24, 2021 and June 25, 2021.

13. **HUBBARD** walked to the back door of the residence. At that time, law enforcement agents contacted the subject and took him into custody.

14. During a search incident to arrest, agents located a sex toy on **HUBBARD's** person and condoms and lubricant inside his vehicle.

15. **HUBBARD** was interviewed on location immediately following the arrest.

16. During an interview, **HUBBARD** admitted that he was the one who had been chatting with the UCE profile and he was aware that he was a minor. **HUBBARD** identified his phone number that he used to chat with the minor. **HUBBARD** further admitted that he intended to have sexual intercourse with the minor.

**CONCLUSION**

17. Based on the foregoing, I submit that there is probable cause to believe that between June 24, 2021 and June 25, 2021, **HUBBARD** committed the offense set forth in Count 1 of this Complaint.

*Treva E. Mathews*

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Treva E. Mathews, Special Agent  
Federal Bureau of Investigation

STEVEN D. WEINHOFET  
United States Attorney

*Alexandra Burns*

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ALEXANDRIA BURNS  
Assistant United States Attorney

Subscribed and sworn to before me this

26th day of June, 2021, at East St. Louis, Illinois.

*Gilbert C. Sison*  Digitally signed by Judge  
Sison 2  
Date: 2021.06.26 21:32:38  
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GILBERT C. SISON  
United States Magistrate Judge